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September 10, 2008

VIA ELECTRONIC FILING

Mr. Charles L.A. Terreni Chief Clerk/Administrator South Carolina Public Service Commission 101 Executive Center Drive, Suite 100 Columbia, SC 29210

Re:

Certification of the Use of Universal Service Funds Pursuant to 47 C.F.R. 54.313 and 54.314 and the Telecommunications Act Section 254 (e) for Wireless ETCS

Docket Nos.: 2008-298-C; 2008-290-C; 2008-299-C

Dear Mr. Terreni.

This letter is an update to our filing of August 22, 2008. ORS has received a completed USF worksheet from FTC Communications, Inc. d/b/a FTC Wireless. HTC Communications LLC has stated that as they were not designated an Eligible Telecommunications Carrier ("ETC") until April of 2008, they will not be submitting a USF worksheet for revenues collected for the calendar year ending 2007. Hargray Wireless, LLC via a letter filing of August 29, 2008, has indicated that it will not submit a USF worksheet on the basis that there has been no Commission order requiring Hargray Wireless to contribute to the South Carolina Universal Service Fund.

As the fund administrator, ORS has the duty to fairly and equitably enforce the Commission's orders. Among the wireless ETC's, there is a difference in interpretation of Order No. 2001-419. ORS respectfully requests that if the Commission sought by Order No. 2001-419 to require wireless carriers designated as ETC's to immediately start contributing to the state USF, that the Commission not certify Hargray Wireless, LLC for additional federal USF funding, but certify FTC and HTC. ORS is in agreement with HTC that it should not be required to contribute for the year ending 2007.

If, on the other hand, the Commission intended Order No. 2001-419 to be interpreted as a wireless ETC "may" be required to participate in the SC USF when its ETC designation is granted if the Commission so orders, then ORS will not assess FTC, Hargray Wireless, or HTC for contributions to the State USF until the Commission renders such a decision and therefore we would recommend that the companies be certified.

Additionally, ORS does not oppose the Commission certification of any other ETC.

Please feel free to contact me with any questions.

Sincerely,

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Nanette S. Edwards

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